

1 hour of class that the other graduate student was supposed to cover, then Joel taught the remaining two
 2 hours of the class by himself. He successfully led the students in a discussion of early DREAM Act
 3 legislation, including analysis of the legislation, elements of narratives invoked by DREAMERS, and the
 4 pros and cons of these narrative choices that were used to appeal to legislators. As Joel explains so
 5 eloquently, by focusing on the exceptional characteristics of certain DREAMERS, the narrative in
 6 support of this type of legislation excluded other undocumented immigrants from legitimacy in the eyes
 7 of the public and from the dialogue on broader immigration reform in the United States.

8 7. The following week, I checked-in with students on their lecture and discussions with
 9 Joel. The students were deeply impressed by Joel's ability to bring the narrative complexity and
 10 discussion to life. His experiences as an activist in the immigrants' rights movement—for example,
 11 campaigning for the Maryland DREAM Act—were crucial to the class's understanding. Joel conveys
 12 his personal narrative in a uniquely compelling way to students. I think the students found his class
 13 discussions so meaningful because they can identify with Joel as a peer and role model, who is so
 14 accomplished for his age and yet so similar to them. His first-hand perspective is invaluable.

15 8. Joel's perspective is incredibly unique and important not just for my class, but to our
 16 entire field of study. He has a highly unusual trifecta of experience: he has a first-hand understanding of
 17 what it means to be personally at risk and affected by immigration status; he has actively participated in
 18 shaping legal rights for immigrants; and he is a distinguished scholar in citizenship theory. I study
 19 individuals like Joel who are part of the movement, but I am not on the front lines myself, nor am I
 20 personally an at-risk immigrant. I have never had the opportunity to co-teach with anyone that has Joel's
 21 experiences before. Joel's unique background enables him to act as an essential bridge between the on-
 22 the-ground immigrants' rights movements and broader academic theories of citizenship.

23 24 **Harms to Joel, UC Berkeley and Myself from the DACA Rescission**

25 9. Not having Joel at UC Berkeley would be like losing a unique, bilingual language
 26 speaker; Joel has the rare gift of speaking the immigrants' rights movement language and the language
 27 of academia. I understand Joel is applying to law school, which will add a further layer of special
 28 expertise to his research, making his perspective even more invaluable to the field.

1 10. Joel's work for me is particularly impressive given that he is already acting as a full-time
2 GSI for another class with Professor Sarah Song. It is unusual to serve as a GSI for more than one class.
3 It is even more unusual to take on the significant role of leading lectures and discussion as Joel has done
4 for my class, particularly for a student, like Joel, who is just starting the second year of a Ph.D.

5 11. Joel's GSI position with my class requires employment authorization. Without DACA
6 employment authorization, Joel will lose his GSI job. This would be a great loss for Joel and for me, as
7 well as for the students in our class and for UC Berkeley, because of the rescission of the DACA policy.

8 12. Joel's ability to continue in his academic career is also jeopardized by the rescission of
9 the DACA policy. The rescission has produced immediate harm to Joel. He was denied advance parole
10 to attend prestigious academic conferences in Malta and Germany this fall because of the rescission of
11 the DACA policy. It is vital for graduate students to attend such conferences in order to meet their peers
12 and leading academics in their field and learn how to present their work. This is even more so in Joel's
13 field of the international study of citizenship and migration, which by its nature necessitates
14 international study and connections. The inability to travel internationally is a serious impediment to
15 Joel's career. The rescission of DACA is a huge impediment to Joel establishing his academic profile
16 and becoming the significant scholar that he is poised to be and has invested in becoming.

17 13. I have also engaged with other DACA recipient students who have provided meaningful
18 insight and value to my academic research. For example, I collaborated with another DACA-recipient
19 undergraduate student in conjunction with URAP, and in that role she helped me to understand the
20 reluctance of undocumented populations to confront the mental health challenges engendered by the
21 often precarious day-to-day uncertainty of their lives. Discussions with this student informed the
22 questions that I asked in my later study of emotional strategies used in Arizona's immigrants' rights
23 movements. This helped me to focus my attention on a specific project in Arizona that uses art to help
24 undocumented persons heal from their experiences and provide them with tools to address their
25 emotional trauma. I will be publishing a book on my Arizona research that will include examination of
26 this approach to art and trauma for undocumented immigrants. I relied on DACA students' perspectives
27 for this project, and they are the best-situated to assist with my research and framing for this book as I
28

1 continue writing it. The rescission of the DACA policy means likely losing the contributions of these
2 DACA students and their unique, firsthand insights that enrich my research at Berkeley.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is true
4 and correct.

5 Executed on October 25, 2017 in Berkeley, California

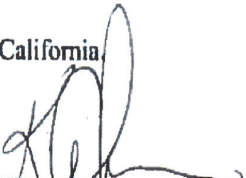
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JIRAYUT LATTHIVONGSKORN

[Additional Counsel Listed on Next Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DULCE GARCIA, MIRIAM GONZALEZ
AVILA, SAUL JIMENEZ SUAREZ,
VIRIDIANA CHABOLLA MENDOZA,
NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA;
DONALD J. TRUMP, in his official capacity
as President of the United States; U.S.
DEPARTMENT OF HOMELAND
SECURITY; and ELAINE DUKE, in her
official capacity as Acting Secretary of
Homeland Security,

Defendants.

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CASE NO. 17-CV-05380-WHA

DECLARATION OF PAMELA BECKWITH

Action Filed: September 18, 2017

Hon. William H. Alsup

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Telephone: (949) 824-7722

DECLARATION OF PAMELA BECKWITH

I, PAMELA BECKWITH, declare as follows:

1. I am the Human Resources Manager at Public Counsel. I have been in this position since August, 2006.

2. In my role as Human Resources Manager, I oversee Public Counsel's compliance with employment-related legal requirements and supervise the onboarding of new employees, and am responsible for verifying employment eligibility for individuals who work at Public Counsel.

3. In order to be in compliance with federal law, Public Counsel verifies identity and work authorization for each person it hires by using the Form I-9. I ensure proper completion of the Form I-9 for each individual Public Counsel hires. In connection with this process, an employee must attest to his or her employment authorization and present acceptable documents that evidence identity and employment authorization.

4. Public Counsel is unable to hire immigrants who do not have the necessary documentation to satisfy the requirements set out in the Form I-9.

5. Viridiana Chabolla worked at Public Counsel from May 2013 to July 2017.

6. I ensured that Ms. Chabolla satisfactorily completed a Form I-9 in connection with her employment at Public Counsel. In order to complete her form I-9, Ms. Chabolla presented her employment authorization card. She also presented her renewed employment authorization cards in 2014 and 2016 to be eligible to continue working at Public Counsel. Attached as Exhibit "A" is Ms. Chabolla's I-9 form, which includes copies of her employment authorization cards.

7. It is my understanding that Ms. Chabolla has a social security number and Employment Authorization Document because she is a DACA recipient. Without documents verifying her work eligibility, she would not have been able to complete the Form I-9 and Public Counsel would not have been able to hire her.

8. If Ms. Chabolla were to lose her work authorization through DACA and did not have other means of establishing her eligibility to work in the United States, Public Counsel would be unable to hire her in the future.

1 I declare under penalty of perjury under the laws of the United States of America that the foregoing is
2 true and correct.

3
4 Executed on October 26, 2017, in Los Angeles, California.

5
6 
7 PAMELA BECKWITH
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EXHIBIT A



Employment Eligibility Verification

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-9
OMB No. 1615-0047
Expires 03/31/2016

► **START HERE.** Read instructions carefully before completing this form. The instructions must be available during completion of this form.
ANTI-DISCRIMINATION NOTICE: It is illegal to discriminate against work-authorized individuals. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.

Section 1. Employee Information and Attestation (Employees must complete and sign Section 1 of Form I-9 no later than the **first day of employment**, but not before accepting a job offer.)

Last Name (Family Name) <u>Chabolla-Mendoza</u>		First Name (Given Name) <u>Viridiana</u>		Middle Initial <u>S</u>	Other Names Used (if any) <u>Viridiana Chabolla</u>	
Address (Street Number and Name) [REDACTED]		Apt. Number [REDACTED]	City or Town [REDACTED]		State [REDACTED]	Zip Code [REDACTED]
Date of Birth (mm/dd/yyyy) [REDACTED]	U.S. Social Security Number [REDACTED]	E-mail Address [REDACTED]			Telephone Number [REDACTED]	

I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.

I attest, under penalty of perjury, that I am (check one of the following):

☐ A citizen of the United States

☐ A noncitizen national of the United States (See instructions)

☐ A lawful permanent resident (Alien Registration Number/USCIS Number): _____

☒ An alien authorized to work until (expiration date, if applicable, mm/dd/yyyy) 12/6/2014. Some aliens may write "N/A" in this field.
(See instructions)

For aliens authorized to work, provide your Alien Registration Number/USCIS Number OR Form I-94 Admission Number:

1. Alien Registration Number/USCIS Number: _____

OR

2. Form I-94 Admission Number: _____

If you obtained your admission number from CBP in connection with your arrival in the United States, include the following:

Foreign Passport Number: _____

Country of Issuance: _____

Some aliens may write "N/A" on the Foreign Passport Number and Country of Issuance fields. (See instructions)

3-D Barcode
Do Not Write in This Space

Signature of Employee: <u>Viridiana Chabolla</u>	Date (mm/dd/yyyy): <u>05/29/2013</u>
--	--------------------------------------

Preparer and/or Translator Certification (To be completed and signed if Section 1 is prepared by a person other than the employee.)

I attest, under penalty of perjury, that I have assisted in the completion of this form and that to the best of my knowledge the information is true and correct.

Signature of Preparer or Translator:		Date (mm/dd/yyyy):	
Last Name (Family Name)		First Name (Given Name)	
Address (Street Number and Name)		City or Town	State Zip Code



Employer Completes Next Page



Section 2. Employer or Authorized Representative Review and Verification

(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR examine a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents" on the next page of this form. For each document you review, record the following information: document title, issuing authority, document number, and expiration date, if any.)

Employee Last Name, First Name and Middle Initial from Section 1:

List A Identity and Employment Authorization	OR	List B Identity	AND	List C Employment Authorization
Document Title: <u>Employment Authorization Card</u>		Document Title:		Document Title:
Issuing Authority: <u>U.S. Citizenship & Imm. Services</u>		Issuing Authority:		Issuing Authority:
Document Number: [REDACTED]		Document Number:		Document Number:
Expiration Date (if any) (mm/dd/yyyy): <u>12/01/2014</u>		Expiration Date (if any) (mm/dd/yyyy):		Expiration Date (if any) (mm/dd/yyyy):
Document Title:				
Issuing Authority:				
Document Number:				
Expiration Date (if any) (mm/dd/yyyy):				
Document Title:				
Issuing Authority:				
Document Number:				
Expiration Date (if any) (mm/dd/yyyy):				

3-D Barcode
Do Not Write in This Space

Certification

I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee's first day of employment (mm/dd/yyyy): 05/28/2013 (See instructions for exemptions.)

Signature of Employer or Authorized Representative <u>Pamela Beckwith</u>		Date (mm/dd/yyyy) <u>05/29/2013</u>	Title of Employer or Authorized Representative Human Resources Manager	
Last Name (Family Name) Beckwith		First Name (Given Name) Pamela	Employer's Business or Organization Name Public Counsel	
Employer's Business or Organization Address (Street Number and Name) 610 S. Ardmore Avenue		City or Town Los Angeles	State CA	Zip Code 90005

Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)

A. New Name (if applicable) Last Name (Family Name) First Name (Given Name) Middle Initial	B. Date of Rehire (if applicable) (mm/dd/yyyy):
--	---

C. If employee's previous grant of employment authorization has expired, provide the information for the document from List A or List C the employee presented that establishes current employment authorization in the space provided below.

Document Title: <u>EMPLOYMENT AUTHORIZATION CARD</u>	Document Number: [REDACTED]	Expiration Date (if any) (mm/dd/yyyy): <u>10/30/2016</u>
---	--------------------------------	---

I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

Signature of Employer or Authorized Representative: <u>Pamela Beckwith</u>	Date (mm/dd/yyyy): <u>11/17/2014</u>	Print Name of Employer or Authorized Representative: <u>PAMELA BECKWITH</u>
---	---	--

* SEE ATTACHED REVERIFICATION - 10/05/2018

CHABOLLA MENDOZA VIRIDIANA


Viridiana S. Chabolla

Surname
CHABOLLA MENDOZA

Given Name
VIRIDIANA S

USCIS# [REDACTED] Category/Class [REDACTED]

Country of Birth
MEXICO

Terms and Conditions
None

Date of Birth [REDACTED] Sex
F

Valid From: **12/07/12**

Card Expires: **12/08/14**

NOT VALID FOR REENTRY TO U.S.



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10/10/17 10:10:10 AM 10/10/17 10:10:10 AM 10/10/17 10:10:10 AM 10/10/17 10:10:10 AM 10/10/17 10:10:10 AM



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IAUSA [REDACTED] K

Section 2. Employer or Authorized Representative Review and Verification

(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR examine a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents" on the next page of this form. For each document you review, record the following information: document title, issuing authority, document number, and expiration date, if any.)

Employee Last Name, First Name and Middle Initial from Section 1: CHABOLLA MENDOZA, VIRIDIANA S.

List A Identity and Employment Authorization	OR	List B Identity	AND	List C Employment Authorization
Document Title:		Document Title:		Document Title:
Issuing Authority:		Issuing Authority:		Issuing Authority:
Document Number:		Document Number:		Document Number:
Expiration Date (if any)(mm/dd/yyyy):		Expiration Date (if any)(mm/dd/yyyy):		Expiration Date (if any)(mm/dd/yyyy):
Document Title:				
Issuing Authority:				
Document Number:				
Expiration Date (if any)(mm/dd/yyyy):				
Document Title:				
Issuing Authority:				
Document Number:				
Expiration Date (if any)(mm/dd/yyyy):				

3-D Barcode
Do Not Write in This Space

Certification

I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee's first day of employment (mm/dd/yyyy): _____ (See instructions for exemptions.)

Signature of Employer or Authorized Representative		Date (mm/dd/yyyy)	Title of Employer or Authorized Representative	
			Human Resources Manager	
Last Name (Family Name)		First Name (Given Name)		Employer's Business or Organization Name
Beckwith Pamela				Public Counsel
Employer's Business or Organization Address (Street Number and Name)			City or Town	State Zip Code
610 S. Ardmore Avenue			Los Angeles	CA 90005

Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)

A. New Name (if applicable) Last Name (Family Name) First Name (Given Name) Middle Initial B. Date of Rehire (if applicable) (mm/dd/yyyy):

C. If employee's previous grant of employment authorization has expired, provide the information for the document from List A or List C the employee presented that establishes current employment authorization in the space provided below.

Document Title:	Document Number:	Expiration Date (if any)(mm/dd/yyyy):
<u>EMPLOYMENT AUTHORIZATION CARD</u>	<u>[REDACTED]</u>	<u>10/05/18 2018</u>

I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

Signature of Employer or Authorized Representative:	Date (mm/dd/yyyy):	Print Name of Employer or Authorized Representative:
<u>Pamela Beckwith</u>	<u>10/27/2016</u>	<u>PAMELA BECKWITH</u>



U.S. Citizenship
and Immigration
Services

123 If found, drop in any US Mailbox. USPS: Mail to USCIS, PO Box 82521, Lincoln, NE 68501-0521

A [REDACTED] <

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF BILL BLAZAR

STATE OF CALIFORNIA, STATE OF
MAINE, STATE OF MARYLAND, and
STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security, and the UNITED
STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, ELAINE C.
DUKE, in her official capacity, and the
UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ
AVILA, SAUL JIMENEZ SUAREZ,
VIRIDIANA CHABOLLA MENDOZA,
NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD
J. TRUMP, in his official capacity as President
of the United States, U.S. DEPARTMENT OF
HOMELAND SECURITY, and ELAINE
DUKE, in her official capacity as Acting
Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, BILL BLAZAR, declare:

2 1. My name is Bill Blazar. I am the Senior Vice President of Public Affairs and
3 Business Development for the Minnesota Chamber of Commerce. I have been employed with the
4 Chamber since 1992. The Chamber is Minnesota's largest business organization, representing more
5 than 2,300 businesses in Minnesota.

6 2. The growth rate of the Minnesota workforce is declining, due in part to shifting
7 demographics. Minnesota's workforce is aging and has insufficient natural growth to sustain the
8 development and expansion of Minnesota's economy. As a result, there is a shortage of skilled workers
9 in Minnesota.

10 3. Rescinding DACA will have an adverse impact on Minnesota businesses.
11 Nationwide, the Deferred Action for Childhood Arrivals (DACA) program allows nearly 800,000 young
12 people who were brought to the United States as children to work and study without the threat of
13 deportation. DACA has empowered a number of these residents to join the Minnesota workforce.
14 Many DACA recipients are employed by Minnesota businesses in a variety of fields. Depriving DACA
15 recipients of their work authorization will further exacerbate Minnesota's workforce shortage.

16 4. Minnesota businesses have hired and retained DACA recipients because of their
17 qualifications, skills, and contributions to their workforces. The rescission of DACA will cause DACA
18 recipients to lose their work authorization, resulting in Minnesota businesses losing the important skills
19 of these employees. Minnesota businesses will lose their investment of time and resources in their
20 DACA recipient employees and will incur expenses in hiring, training, and managing new employees.

21 5. Nationwide, DACA recipients contribute to the global competitive advantage of
22 the United States. DACA recipients help alleviate the shortage of skilled workers in Minnesota. The
23 rescission of DACA will harm some Minnesota businesses.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed on 24 October, 2017, in St. Paul, Minnesota.

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6 BILL BLAZAR
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF MIRIAM FELDBLUM

STATE OF CALIFORNIA, STATE OF
MAINE, STATE OF MARYLAND, and
STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security, and the UNITED
STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, ELAINE C.
DUKE, in her official capacity, and the
UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ
AVILA, SAUL JIMENEZ SUAREZ,
VIRIDIANA CHABOLLA MENDOZA,
NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD
J. TRUMP, in his official capacity as President
of the United States, U.S. DEPARTMENT OF
HOMELAND SECURITY, and ELAINE
DUKE, in her official capacity as Acting
Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

DECLARATION OF MIRIAM FELDBLUM

I, MIRIAM FELDBLUM, declare as follows:

1. I am the Vice President for Student Affairs and the Dean of Students at Pomona College.

I am also a Politics professor and an immigration scholar. Located in Claremont, California, Pomona College is a highly selective, private liberal arts college that provides a comprehensive education in the liberal arts and sciences to a student body of about 1,650 undergraduates, awarding bachelor of arts and bachelor of science degrees to approximately 400 students each year. Since 2008, the college has fully reviewed undocumented students who graduate from a U.S. high school both for need-blind admission and for every type of private full-need financial aid the college offers.

2. I first met Ms. Viridiana Chabolla ("Viri") during her first year at Pomona in 2009. As part of our practice at Pomona, we sought to reach out to undocumented students to let them know about the resources and support on campus. Viri was very engaged and committed, working with my colleagues and me about how best to support undocumented students on campus. Viri was also a student leader at Pomona, working in the Draper Center for Community Partnerships, and in student peer mentoring and campus organizations.

3. As a Politics professor and immigration scholar, I had the pleasure of hearing from Viri about her work as a sociology major. Over the four years I interacted with Viri, her skills and abilities grew in wonderful ways, and she matured impressively both as a student-scholar and leader. Her current accomplishments in law school and the community continue to impress me.

4. The challenges facing undocumented students prior to the advent of Deferred Action for Childhood Arrivals (DACA) were tremendous. Prior to DACA, undocumented students at Pomona faced significant barriers to fully take advantage of their education, find support on and off campus, and as importantly, to contribute back to their community.

5. Prior to DACA, undocumented students at Pomona had no access to employment on campus, even as many student employment positions are key student leadership and educational opportunities that foster students' skills, abilities, and talents. These positions include resident advisor, research assistant, program assistant, head mentor positions, and so on. While Viri was a student at Pomona, we worked with her and other undocumented students to identify student leadership

1 opportunities that they could pursue that did not require work authorization. While we worked over the
2 years to identify and develop potential experiential learning fellowship positions that were not
3 employment based positions, these opportunities were very limited, as they could not be in service to the
4 College, faculty, staff, or other students, and they must incorporate specific kinds of educational
5 components.

6 6. Undocumented students at Pomona and elsewhere were also unable to participate in
7 Study Abroad, which is integral to the undergraduate educational experience, and required, in fact, for
8 some majors. While we worked with students and faculty to identify alternative domestic programs or
9 provide waivers from a study abroad requirement in certain majors, the inability to go abroad for
10 educational reasons detracted from the liberal arts educational experience for these students.

11 7. Overall, while Pomona College treated undocumented students as domestic students for
12 the purposes of admission and institutional financial aid, undocumented students on our campus still
13 faced numerous challenges both on and off campus. Beyond issues of employment and academic
14 opportunities, undocumented students at Pomona were not sure they could trust us with information
15 regarding their status, or who they should go to with questions about financial issues, academic
16 concerns, or family situations that were related to their status. Off-campus, undocumented Pomona
17 students faced numerous barriers as well, including lack of drivers' licenses or official state-issued
18 identification cards, inability to access federal or state financial aid, and so on. Undocumented students
19 at Pomona came from across the country, and so many also had to travel domestically to get to and from
20 home. These students were worried about immigration enforcement for themselves and their families.

21 8. As a student at Pomona before she received DACA, Viri faced all these significant
22 challenges. And, even as a student, Viri was also very involved in helping us at the college identify the
23 ways in which we could provide effective support for the growing numbers of undocumented students
24 on our campus.

25 9. Prior to the advent of DACA, we worked with Viri and other students to develop support
26 for undocumented students in terms of policy, people, practices, and programs. As noted above, a
27 foundational part of the College's support has been our policy in place since 2008, to treat
28 undocumented students as domestic students for the purposes of admission and financial aid. However,

1 in listening to and working with our undocumented students, we recognized that access to campus was
2 only one component of the support that students needed to thrive and succeed at Pomona. Other key
3 components included: (1) identifying key staff members and faculty advisors to provide direct support to
4 students, and who could serve as links to a student support network and other kinds of outreach; (2)
5 providing program funding for the student support network and peer mentoring; (3) training staff and
6 providing consultation for faculty on how to support undocumented students, including providing
7 historical and policy contexts; (4) developing non-employment based opportunities for leadership and
8 learning opportunities; and (5) identifying emergency grant funding for student needs.

9 10. Overall, we worked to develop a proactive, visible network of support, programs, and
10 funding for undocumented students on campus, and moved away from a “don’t ask, don’t tell”
11 approach. At the same time, we were also very mindful of the need to safeguard student privacy and
12 confidentiality.

13 11. Because of our extensive work with undocumented students prior to the advent of
14 DACA, Pomona College is well positioned to comment on the already powerful benefits of DACA for
15 Viri, and other college students, as well as the devastating impact that the termination of the program
16 has already had and will certainly continue to have unless something is done. Approximately 4% of the
17 Pomona undergraduate population is “DACAmended” or undocumented, with the vast majority of
18 students being DACA recipients.

19 12. As DACA recipients, we have witnessed numerous Pomona College students who have
20 now been able to further their educational experiences through study abroad, research assistantships, job
21 opportunities, internships, and work on campus as student leaders, future scholars and leaders of our
22 communities. Pomona College alumni, who are DACA recipients, have gone on to medical school,
23 teaching and graduate school, as well as work in the high tech industry, business and community
24 organizations. Viri’s incredible success as a law student, as well as her work in the community, are a
25 testament to her potential as a future leader and societal contributor.

26 13. DACA transformed the daily lives of our undocumented students, including through
27 employment on campus as resident advisors, research assistants, head mentors, tutors, and more, the
28 ability to go on Study Abroad, work in community-based organizations, and to travel to conferences and

1 research or job opportunities during the academic year and summer, all without the fear of deportation.
2 Our undocumented students were able to receive drivers' licenses, which also opened up additional
3 opportunities. While DACAmented students continued to face challenges on and off campus, the level
4 of anxiety among these students significantly decreased, and many of them engaged in long-term
5 planning. In the past five years, among Pomona College DACAmented students and alumni, many have
6 pursued and received outstanding job offers across many different industries and graduate school
7 acceptances (academic fields, law, and medicine), which in turn, have helped them to provide for their
8 families and start to build for their future. Almost without exception, all these students and alumni have
9 also been very engaged in the community, looking to pay it forward, and to contribute to supporting
10 others and the communities in which they live.

11 14. With the new changes in interior enforcement since January 2017, and the announcement
12 of the rescinding of DACA in September 2017, life has once again changed for our students and alumni
13 who are DACA recipients – this time in devastating ways. From deteriorating emotional wellbeing to
14 reporting grave concerns about family members, from losing access to go on study abroad to the
15 diminishment and precariousness of future work and life prospects, our students and alumni have been
16 gravely harmed by the rescinding of DACA.

17 15. Since the termination of DACA earlier this year, I have had the opportunity to speak with
18 Viri, other alumni and many of our current students like Viri about how they are feeling. In a gathering
19 of our DACAmented and undocumented students after the announcement on September 5, students
20 expressed deep fear, anxiety, numbness, uncertainty, and concern. The termination has devastated those
21 students who are DACA recipients. They are scared about what their futures hold, and uncertain about
22 whether they will be able to continue their schooling or continue on to the dream jobs that they all are
23 striving for. The fear and stress have manifested itself as depression and increased anxiety in many of
24 our students, and has impacted their ability to excel in school as they did before. The impacts of the
25 termination are already palpable on campus and, unless it is stopped, the harm to these students and our
26 campus generally will be irreparable.

27 16. In an September 5, 2017 op-ed piece for *USA Today*, Victor Cuicahua, a senior history
28 major at Pomona College who grew up in Alabama, where he was a co-founder of the Immigrant Youth

Leadership Initiative of Alabama, wrote eloquently about what the loss of the DACA means to him personally: "DACA changed everything. It allowed me to work in cramped restaurant kitchens across Birmingham for 60 hours a week to save for an education that was expensive but no longer inaccessible. It allowed me to become the first undocumented student at the University of Alabama, from which I later transferred to one of the best colleges in the country. It allowed me to imagine returning to Alabama as a history teacher after graduation, ready to serve a future generation of students. But the rescindment of DACA closes the door to a classroom I had hoped to enter for years."

17. While the College continues to provide emergency grant funding for students, and has developed a pro-bono legal resource network for students, alumni, and their families along with other resources, the winding down of DACA is forcing our students and alumni back into a precarious "limbo" as Roberto Gonzales describes in his 2015 book on undocumented immigrant youth. In a letter written to other college and university presidents, our current President Gabi Starr and President Emeritus David Oxtoby wrote: "Ending DACA means that these young people – Americans in all but legal status – will be vulnerable to deportation," said Starr and Oxtoby. "They will lose their ability to contribute fully to our campuses, to our communities and to our country. Their loss, and that of other undocumented young people, is fundamentally our country's loss." We at Pomona are very proud to support Viri Chabolla, a student leader while she was on campus, and now, an inspiring community leader.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 30, 2017, in Claremont, California.



MIRIAM FELDBLUM

EXHIBIT LL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF NORBERTO DUENAS

Date: December 20, 2017

Time: 8:00 a.m.

Judge: Honorable William Alsup

Dept.: Courtroom 8

Complaint Filed: September 14, 2017

Trial Date: February 05, 2018

1 STATE OF CALIFORNIA, STATE OF
2 MAINE, STATE OF MARYLAND, and
STATE OF MINNESOTA,

3 Plaintiffs,

4 v.

5 U.S. DEPARTMENT OF HOMELAND
6 SECURITY, ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
7 of Homeland Security, and the UNITED
STATES OF AMERICA,

8 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,

10 Plaintiffs,

11 v.

12 DONALD J. TRUMP, President of the United
13 States, in his official capacity, ELAINE C.
DUKE, in her official capacity, and the
14 UNITED STATES OF AMERICA,

15 Defendants.

CASE NO. 17-CV-05329-WHA

16 DULCE GARCIA, MIRIAM GONZALEZ
17 AVILA, SAUL JIMENEZ SUAREZ,
VIRIDIANA CHABOLLA MENDOZA,
18 NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

19 Plaintiffs,

20 v.

21 UNITED STATES OF AMERICA, DONALD
J. TRUMP, in his official capacity as President
22 of the United States, U.S. DEPARTMENT OF
HOMELAND SECURITY, and ELAINE
23 DUKE, in her official capacity as Acting
Secretary of Homeland Security,

24 Defendants.

CASE NO. 17-CV-05380-WHA

COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

CASE NO. 17-CV-05813-WHA

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

I, **NORBERTO DUENAS**, declare and state as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.

2. I was the City Manager of the City of San Jose, California ("San Jose") from 2015 until October 2017. I began my career in public service in 1984 as an intern, before ultimately taking on a variety of roles over my 33 years of rising through the ranks of city government. Prior to my current position, I attended San Jose State University for both my bachelor's in political science and master's in public administration.

3. My experience as a Cuban refugee and international upbringing, along with my decades of educational and administrative experience in San Jose, have singularly enabled me act as a link between the immigrant community and the City. It has been my judgment based on the many projects I have overseen during my tenure that our employees' collaborative spirit and dedication to public service are what have most contributed to our City's successes and achievements. This same collaborative spirit and dedication has served us well during the good as well as the challenging times.

4. San Jose is the third largest city in California, the tenth largest city in the United States, and one of the most racially diverse cities in California. Immigrants from all over the world have come to San Jose. On its website, San Jose has a Fact Sheet that provides important information about the

1 city. Attached hereto as Exhibit A is a true and correct copy of the Fact Sheet, which can also be found
2 at <http://www.sanjoseca.gov/DocumentCenter/View/780>.

3 5. San Jose is extremely diverse, with recent immigrants making up nearly 40% of its
4 population. Immigrants contribute an estimated \$77 billion to the economy of Santa Clara County as a
5 whole. Of these immigrants, it is estimated that at least 77,000 are either eligible for or have received the
6 benefits of the DACA program.

7 6. San Jose has made it a central mission to aid these DACA recipients, and to foster full
8 participation among them in our community. Consistent with that, the City Council authorized the
9 creation of an Office of Immigrant Affairs to coordinate responses upon the advent of DACA. The
10 following is a sample of the City's dedication to and dependence on immigration communities within its
11 borders:

- 12 a. In September 2016, the Mayor and City Council adopted a "Welcoming San Jose"
13 Resolution that described guiding principles for making San Jose a more welcoming
14 and inclusive place for all residents. Afterward, the Office of Immigrant Affairs
15 developed a three-year immigrant integration plan.
 - 16 b. Also in 2016, the City of San Jose became a member of Welcoming America, a
17 national organization leading the movement to create more inclusive communities.
 - 18 c. San Jose partnered thereafter with the White House's Building Welcoming
19 Communities Campaign and Cities United for Action. As a result of active
20 participation in these networks and successful progress made on developing the Plan,
21 San Jose has benefitted from national attention on the issue of immigration.
 - 22 d. The White House selected ten cities to co-host a convening to discuss immigrant
23 integration strategies, and San Jose was one of the cities honored with the
24 opportunity.
 - 25 e. San Jose's Office of Immigrant Affairs is a recipient of the "Gateways for Growth
26 Challenge" grant from the Partnership for a New American Economy. This grant
27 provides the Office a research brief with data on local immigrants.
- 28

1 7. In order to properly serve its residents, San Jose must have employees who are fluent in
2 languages other than English, and who are sensitive to the different cultures and backgrounds of its
3 residents. This is especially true when San Jose experiences a disaster: it is critical to have city
4 employees who can communicate with the affected residents and understand the residents' immediate
5 needs. We were again reminded of this all too powerfully during recent flooding events, when the
6 language and cultural skills unique to DACA recipients were in short supply.

7 8. Finding qualified employees is always difficult for municipalities, but it is particularly
8 challenging for San Jose because of competition with Silicon Valley companies. San Jose has not been
9 able to hire all the qualified employees that it needs. As the Fact Sheet, Exhibit A, confirms, Silicon
10 Valley employers like Cisco Systems, eBay, PayPal, IBM Corporation, Adobe Systems, and Kaiser
11 Permanente hire thousands of San Jose residents as employees. Luckily, unemployment in San Jose is
12 low. It is therefore important for San Jose and the companies in the Silicon Valley to have as many
13 potential employees as possible.

14 9. As a result of the enactment of DACA (Deferred Action for Childhood Arrivals) in June
15 of 2012, the employment pool for San Jose and Silicon Valley companies increased. San Jose does not
16 ask about immigration status on its employment applications; therefore, it cannot quantify the number of
17 DACA recipients who work for the City of San Jose. However, there is no question that San Jose has
18 benefited by being able to hire DACA recipients because the pool of qualified applicants has increased.

19 10. Under federal regulations, employees who begin work are required to demonstrate that
20 they have authorization to work in the United States. If DACA is rescinded, San Jose would have to
21 take steps to make sure that all of its employees have valid authorization to continue working. If DACA
22 is rescinded, San Jose will not be able to retain as employees anyone who is not authorized to work.

23 11. The loss of even one San Jose employee because of the rescission of DACA will hurt San
24 Jose, not to mention the individual employee, because San Jose spends time and resources to train
25 employees. San Jose has spent particular resources for training and outreach related to the DACA
26 program. Moreover, the experience that employees gain in their jobs is invaluable in the provision of
27 critical City services.
28

1 12. I speak to community leaders and residents on a regular basis as part of my job duties.
2 Since President Trump's election, there has been fear in the immigrant community that his
3 administration would start mass deportations, especially of people of Mexican heritage. After the
4 announcement that DACA would be rescinded, that fear and anxiety has increased. It is not only fear
5 and anxiety by DACA recipients, but also their families and the entire immigrant community. Not only
6 with DACA's rescission harm San Jose's workforce, but based upon projections I have reviewed, San
7 Jose stands to lose tax revenues if DACA is rescinded.

8 13. DACA's recession will result in direct harm to our city residents insofar as it would result
9 in the City's losing employees. The residents would lose critical services at a time when we are already
10 stretched thin with hundreds of vacancies at City Hall. The City would suffer tangible losses from
11 DACA's rescission given the significant services, work product, and taxes that these employees
12 currently contribute.

13 14. As an immigrant to the United States myself, I have a deep and personal appreciation of
14 the challenges of joining a new society, the opportunities that exist in America, and the contributions
15 that immigrants make that enrich our communities. I also have profound respect for the courage and
16 talents of immigrants to our community, for I know it is not an easy transition. The City of San Jose
17 understands that our neighborhoods and our businesses gain so much from what immigrants bring: their
18 energy, their skills, and their perspectives that strengthen the vitality of our city.

19 I declare under the penalty of perjury under the laws of the United States that the foregoing is
20 true and correct and that this declaration was executed on October 27 2017 at San Jose,
21 California.

22
23 
24 NORBERTO DUENAS

EXHIBIT A